

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.)	CASE NO. 1:08 CV 2755
)	
Plaintiff,)	JUDGE WELLS
)	
v.)	<u>THE CONSENT MOTION FOR AN</u>
)	<u>EXTENSION OF TIME OF SAP</u>
SAP AMERICA, INC., et al.)	<u>AMERICA, INC. AND SAP AG,</u>
)	<u>INC. TO RESPOND TO THE</u>
Defendants.)	<u>PLAINTIFF'S AMENDED</u>
)	<u>COMPLAINT</u>

Defendants, SAP America, Inc. and SAP AG (collectively referred to herein as the “SAP Defendants”), by and through their undersigned counsel, respectfully request an Order from the Court granting them an extension of time through June 1, 2009, within which to answer or otherwise respond to the Plaintiff’s Amended Complaint.

At the present time, the SAP Defendants must respond to the Plaintiff’s Amended Complaint on or before May 11, 2009.

The SAP Defendants respectfully make this request in good faith, not for the purposes of delay, and in the interests of judicial economy. No prior extensions in which to respond to Plaintiff’s Amended Complaint have been sought by the SAP Defendants, nor have any such extensions been granted by the Court.

Further, counsel for the Plaintiff has consented to the requested extension of time.

The SAP Defendants respectfully request that this Motion be granted and that June 1, 2009, be ordered as the new deadline for the SAP Defendants to answer or otherwise respond to the Plaintiff’s Amended Complaint.

Respectfully submitted,

/s/Leo M. Spellacy, Jr., Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2009 a copy of foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Leo M. Spellacy, Jr.

One of the Attorneys for Defendants
SAP America, Inc. and SAP AG